

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION



Saide Ibrahim

Plaintiff,

Case No.:

1:14 CV 1222  
LOG/IDG

v.

21<sup>ST</sup> MORTGAGE CORPORATION  
CORPORATION SERVICE COMPANY

SAMUEL I. WHITE, P.C  
WILLIAM ADAM WHITE

WRONGFUL FORECLOSURE

Defendant,

WRONGFUL FORECLOSURE

For the claim is with the knowledge of the claimant, who is known to be: Saide: Ibrahim. For the claim is as follows:

1. For the claim is 21<sup>ST</sup> MORTGAGE CORPORATION is not the record owner due to the fact 21<sup>ST</sup> MORTGAGE CORPORATION fail to recognized the current record owner, who is K AND L ACQUISITIONS TRUST, of 5027 Americana Drive, Annandale, Virginia 22003, registered and filed in Land Records in December 2012 (Deed of Records)(See Exhibit A).
2. For the claim is 21<sup>ST</sup> MORTGAGE CORPORATION through their Attorney SAMUEL I. WHITE, P.C, bypass the Registered Owner and transferred from a previous owner to their name in a Deed of Foreclosure (See Exhibit B).
3. For the claim is under Federal Rule 803.6, Rule 803.24 and Rule 804. For the claim is I declare that R.K Arnold was President and CEO of M.E.R.S INC, who did testify that all Notes were photographed and then destroyed. For the claim is this activity means that 21<sup>ST</sup> MORTGAGE CORPORATION does not have an Original Note to be in right standards to Foreclose.
4. For the claim is the Deed of Foreclosure is not a true and accurate copy because the transfer of Title in the Deed of Foreclosure does not show a transfer from K AND L ACQUISITIONS TRUST, who is the actual current registered owner on record (See Exhibit B).

For the claim is the 1<sup>st</sup> cause of action, in which relief can be granted is that statements 1-4 listed above, shows activity of fraud, violation of Title 55 Chapter 80.

- Fraudulent transfer.
- Fraud intent by posing to own or hold the original note in order to Foreclose.

For the claim is the 2<sup>nd</sup> cause of action, in which relief can be granted is violation of Title 42 USC 1983.

- Deprivation of property (equity) rights through fraudulent activity by the Defendants.

For the claim is the 3<sup>rd</sup> cause of action in which relief can be granted is violation of Title 42 USC 1985.3

- SAMUEL I. WHITE, P.C and 21<sup>ST</sup> MORTGAGE CORPORATION conspired to deprive the right of ownership of 5027 Americana Drive, Annandale, Virginia 22003, by fraudulent activity which is stated in 1-4 listed above.

For the claim is the 4<sup>th</sup> cause of action in which relief can be granted is violation of Title 42 USC 1986.

- SAMUEL I. WHITE, P.C had the ability to prevent the foreclosure but failed to do so but participated in the fraudulent transfer of the Deed to 21<sup>ST</sup> MORTGAGE CORPORATION, ignoring the actual current Registered Owner on Record (K AND L ACQUISITIONS TRUST).

For the claim is in Conclusion, I pray that this Court set aside sale and Transfer of Title and any judgment that has been granted to 21<sup>ST</sup> MORTGAGE CORPORATION under Title 55 Chapter 82.2 and any authority this Court may have to vacate these activities, Judgments and Rules. I, also pray that this Court grants a monetary relief for the violation, stress, and anxiety that I have experienced in this wrongful foreclosure. My Finally Request is that I demand a jury trial if this case is not settled before this case goes trial.

SAIDE IBRAHIM  
Autograph  
UCC 1-308

16/09/14  
Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

Saide Ibrahim

Plaintiff,

Case No.: 1:14cv1222

v.

21<sup>ST</sup> MORTGAGE CORPORATION  
CORPORATION SERVICE COMPANY

SAMUEL I. WHITE, P.C  
WILLIAM ADAM WHITE

WRONGFUL FORECLOSURE

Defendant,

CERTIFICATE OF MAILING

For the claim is with the knowledge I have sent a - copy - of the WRONGFUL  
FORECLOSURE, and AFFIDAVIT FOR WRONGFUL FORECLOSURE, by  
Certified Mail, to the following location(s) on this 16 day of  
September, in the year 2014:

21ST MORTGAGE CORPORATION  
620 Market Street  
Knoxville, TN 37902

[Registered Agent for 21ST MORTGAGE CORPORATION]  
CORPORATION SERVICE COMPANY  
Bank of America Center  
16th Floor, 1111 East Main Street  
Richmond, VA 23219

SAMUEL I. WHITE, P.C.  
5040 Corporate Woods Drive  
Suite 120  
Virginia Beach, VA 23462

[Registered Agent for SAMUEL I. WHITE, P.C.]

William Adam White  
5040 Corporate Woods Drive  
Suite 120  
Virginia Beach, VA 23462

SAIDE IBRAHIM  
Autograph  
UCC 1-308

16/09/14  
Date